



DEPARTMENT OF NATURAL RESOURCES

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September 29, 1986

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SAN JUAN, P.R.

File:
Arecibo

Mr. Pedro Gelabert
Director
Caribbean Regional Office
Environmental Protection Agency
1413 Fernández Juncos Ave.
Santurce, P.R. 00909

Subject: Comments on "Preliminary
Study to Include the
Arecibo Dumping Place
in the Superfund Program"

C-73-007 JCA

Dear Mr. Gelabert:

From the document submitted to us for evaluation we understand the following:

1. The study indicates wetlands areas at 2.6 miles from the dumping place located in an area that is part of the "Caño Tiburones", which is the largest wetland's area in Puerto Rico. There are mangrove swamps, herbaceous swamps and many marshes all of which constitute one of the most important wildlife habitats in Puerto Rico.
2. Approximately 450,000 tons of waste material, most of which is highly contaminant, have been dumped in the area. There have been detected the presence of metallic silt, formation from pharmaceutical processes, corrosive materials and sanitary waste in the waters. Moreover, the presence of heavy metals and solvents have been detected in superficial waters used for agricultural irrigation and livestock consumption.
3. The material has been dumped in trenches. Several drainage channels irradiate from the dumping place to the east, north, and west facilitating the movement of toxic substances to "Caño Tiburones".

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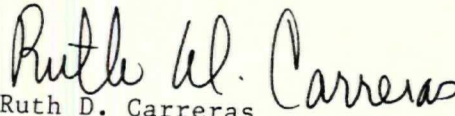


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4. The dumping place is located 5 miles southwest from the "Río Grande de Manatí" estuary. Also, it is located 4.5 miles east from the "Río Grande de Arecibo" estuary which is of more importance than the one of "Río Grande de Manatí".
5. The habitat of the native "Sapo Concho" is 5 miles from the dumping place. The Department of Natural Resources has declared a sector located 1 1/2 miles to the northwest from the dumping place as an essential habitat for the native "Chiriría" Dendrocygna arborea and the native "Gallinazo" Fulica caribea. These species have been declared vulnerable to any significant change in their habitat, or that a small reduction in their populations will change their classification to the endangered species status.
6. The study indicates a concentration of heavymetals found in the analysis of surface water. It is also indicated that the contaminants might be migrating to the aquifer. This aquifer is the source of water for domestic use for most part of the residents in the north central coast of Puerto Rico.

According to the stated above the Department of Natural Resources considers necessary to include this dumping place in the Superfund Program.

Cordially yours,


Ruth D. Carreras
Assistant Secretary
for Permits Area